

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

May 7, 2021

Michael Roper Chief Executive Officer Muscle Maker, Inc. 308 East Renfro Street, Suite 101 Burleson, Texas 76028

Re: Muscle Maker, Inc.
Registration Statement on Form S-3
Filed April 30, 2021
File No. 333-255700

Dear Mr. Roper:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Daniel Morris at 202-551-3314 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Stephen Fleming